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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	§	
	§	
PRIMERA ENERGY, LLC	§	CASE NO. 15-51396
21022 Gathering Oak #2101	§	
San Antonio, Texas 78260	§	
BEXAR-TX	§	
	§	
DEBTOR.	§	CHAPTER 11

TRUSTEE'S APPLICATION TO
EMPLOY TRATON ENGINEERING ASSOCIATES, L.P.

NOW COMES JASON R. SEARCY, CHAPTER 11 TRUSTEE for Primera Energy, LLC (the "Trustee" and/or "Applicant"), and makes this his Application to Employ Traton Engineering Associates, L.P. (the "Application") and in support thereof respectfully represents as follows:

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.

IF NO TIMELY RESPONSE IS FILED WITHIN 21 DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.

A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD

I.

On June 3, 2015, an Order for Relief under Chapter 11 of the United States Bankruptcy Code was entered against Primera Energy, LLC (the “Debtor”). On July 10, 2015, the U.S. Trustee filed an Application to appoint a Trustee for this case; and subsequent thereto, on July 13, 2015, Jason R. Searcy was appointed to serve as the Trustee. Jason R. Searcy is the duly appointed and serving Chapter 11 Bankruptcy Trustee for the above-named Debtor.

II.

Applicant requires the services of Traton Engineering Associates, L.P. to operate and maintain the oil and gas properties of the Debtor. These services will include:

- A. Engineering supervision of existing operations such as direction of gaugers and office personnel
- B. Railroad Commission reporting
- C. Joint Interest Billing
- D. Review and pay all account vendors
- E. Revenue processing and distribution including Severance Tax reporting and payment (the “Operator Services”).

The Operator Services will be done on a contract basis for the Debtor with the Debtor’s railroad commission permit and bonds remaining in place.

In addition, the Trustee will from time to time require additional services of Traton Engineering Associates, L.P. These may include moving and transferring the books and records of the Debtor so they may be used in the operations, expert advice as to oil and gas engineering and operations, such services as may be required of a petroleum engineer from time to time to determine the viability of well completions and planning or design.

III.

For the foregoing and all other necessary and proper purposes, Applicant desires to employ Traton Engineering Associates, LP whose address is 1415 N. Loop W, Suite 1250, Houston, Texas 77008; tel. 713 299 7558..

IV.

Applicant is informed and believes that the firm of Traton Engineering Associates, LP has extensive experience in the matters upon which it is to be retained, and Applicant feels that said firm is well qualified to render the services required by Applicant.

V.

The terms and conditions of the proposed employment are set out on the Contract Operating Services Agreement attached hereto and the well operations will be in accordance with the Joint Operating Agreement attached. These charges are uniform, reasonable, and standard in the industry. The operator of oil and gas properties is entitled to charge a reasonable fee for such operations under the joint operating agreements signed by all interests owners in each well. This fee will be a charge against the production from the well and is a charge and payment to be made in the ordinary course of business. Debtor's interest in the wells will be subject to its proportionate share of such charges and the remainder of the charges will be charged by joint interest billings to the other owners in each well. Applicant requests that no additional fee applications be required for the Operator Services since they are for services rendered in the ordinary course of Debtor's business.

VI.

To the best of Applicant's knowledge and based upon the Declaration attached hereto, the firm of Traton Engineering Associates, L.P. represents no other entity in connection with this case and represents nor holds any interest adverse to the interest of this estate with respect to the matters on which it is to be employed and is a disinterested party within the meaning of 11 U.S.C. §101(14).

A Rule 2014 Declaration of Pat Merritt is attached hereto.

A retainer has not been paid to the firm of Traton Engineering Associates, L.P.

WHEREFORE PREMISES CONSIDERED, Applicant prays for an Order of this Court approving the employment of Traton Engineering Associates, LP to render services in the areas described above with such compensation as set out herein and authorizing the Trustee to enter into and execute the Contract Operating Services Agreement in the form attached hereto.

SIGNED this the 6th day of August 2015.

Respectfully submitted,

SEARCY & SEARCY, P.C.

By: /s/ Jason R. Searcy
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document has been forwarded via electronic mail, if available, and/or via regular mail, postage prepaid to all parties on the attached service list on or before the 6th day of August, 2015.

/s/ Jason R. Searcy
Jason R. Searcy, Trustee